

**GARY TSIRELMAN, P.C.**

ATTORNEYS AND COUNSELORS AT LAW

Gary TSIRELMAN M.D., Esq.

55 WASHINGTON ST., SUITE 606  
BROOKLYN, NEW YORK 11201  
TELEPHONE: (718) 438-1200  
FACSIMILE: (718) 438-8883  
E-MAIL: info@gtmdjd.com

Julia PASKALOVA, Esq.

Massimiliano VALENZO, Esq. \*

\* Also Admitted to Italy

FD-302 (Rev. 10-6-95)

**BY PERSONAL DELIVERY**

**July 3, 2007**

Hon. Naomi R. Buchwald  
United States District Judge  
500 Pearl St., Room 2270  
New York, NY 10007

**RECEIVED**  
**U.S. DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**  
**7/10/07**

**Re: Hochberg v. WZO, Case # 07-CV-3470**  
**REQUEST TO ORDER DEPOSITION OF THE DEFENDANT'S EMPLOYEES**  
**RACHEL MAROM AND SHUKI MENASHE BEFORE THEY LEAVE USA**

Dear Judge:

It has come to my attention yesterday that two very important witnesses, employees of the Defendant, namely, Yehoshua (Shuki) Menashe, the Treasurer of the Defendant, and his assistant, Rachel Marom, are leaving USA for Israel for good, in a matter of days. Their deposition is crucial to this case because of the following:

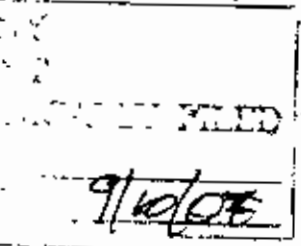
- 1) Mr. Menashe, as the Treasurer, was the signatory on the letter which confirmed the long-standing agreement that my client Jane Hochberg was to receive a retirement package/compensation.
- 2) Mr. Menashe was privy to numerous correspondence/conversations regarding the conditions of Ms. Hochberg's retirement.
- 3) Mr. Menashe as a Treasurer has knowledge and expertise in the matters concerning the Defendant's practice in giving its employees a severance pay/compensation upon their departure from Defendant.
- 4) Ms. Marom was the individual who typed correspondence for Mr. Menashe, including the letter that confirmed Ms. Hochberg's right to retirement package.
- 5) Ms. Marom as Mr. Menashe's assistant was a witness to conversations on the subject of Ms. Hochberg's retirement and compensation.

Therefore, the Plaintiff Ms. Hochberg respectfully requests that the Court order the deposition of these individuals before they leave USA.

Respectfully submitted,

Gary Tsirelman (GT3489)

CC: Shira Y. Rosenfeld, SHIBOLETH, YISRAELI, ROBERTS & ZISMAN, LLP  
1 Penn Plaza, Suite 2527 New York, NY 10119



Endorsement  
Discovery dispute resolved  
at a conference with the  
parties in July, 2007.  
So Ordered.  
9/10/07  
Hon. Naomi R. Buchwald